

DICKINSON WRIGHT PLLC

MICHAEL N. FEDER (Nevada Bar #7332)

JOHN L. KRIEGER (Nevada Bar #6023)

3883 Howard Hughes Parkway, Suite 800

Las Vegas, Nevada 89169

Tel: (702) 550-4400

Fax: (844) 670-6009

Email: mfeder@dickinson-wright.com

Email: jkrieger@dickinson-wright.com

JOHN S. ARTZ (*Admitted Pro hac vice*)

YAFEEZ S. FATABHOY (*Admitted Pro hac vice*)

350 S. Main Street, Suite 300

Ann Arbor, MI 48104

Tel: (248) 433-7200

Fax: (844) 670-6009

Email: jartz@dickinson-wright.com

Email: yfatabhoy@dickinson-wright.com

Attorneys for Defendants/Counter-Claimants

Light & Wonder, Inc. and SG Gaming, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EMPIRE TECHNOLOGICAL GROUP
LIMITED,

Plaintiff,

vs.

LIGHT & WONDER, INC., and
SG GAMING, INC.,

Defendants.

LIGHT & WONDER, INC., and
SG GAMING, INC.,

Counter-Claimants,

vs.

EMPIRE TECHNOLOGICAL GROUP,
LIMITED,

Counter-Defendant.

Case No. 2:22-cv-00923-MMD-BNW

**STIPULATION AND PROPOSED ORDER
TO EXTEND THE DEADLINE
GOVERNING THE LAST DAY TO FILE
SUMMARY JUDGMENT MOTION
REGARDING INITIAL PHASE OF
DISCOVERY**

(SECOND REQUEST)

Plaintiff/Counter-Defendant Empire Technological Group Limited (“Plaintiff/Counter-Defendant”) and Defendants/Counter-Claimants Light & Wonder, Inc. and LNW Gaming, Inc., formerly known as SG Gaming, Inc. (“Defendants/Counter-Claimants”) (together, the “Parties”), by and through their respective counsel of record, hereby respectfully submit this Stipulation and Proposed Order to extend the deadline governing the deadline to file Summary Judgment relating to the Initial Phase of Discovery in this case (“Summary Judgment Deadline”). Previously, the Court entered an Order extending all discovery deadlines in this matter thirty (30) days, including the Summary Judgment Deadline. This Stipulation will not affect any deadlines other than the Summary Judgment Deadline. This is now the second request to extend the Summary Judgment Deadline and the Parties seek a seven (7) day extension. The Parties have agreed to such extension for the reasons set out below.

COMPLETED DISCOVERY

In the Discovery Plan and Scheduling Order (Dkt No. 23), the Parties bifurcated discovery into two phases. During the Initial Phase of Discovery, which was limited to Light & Wonder’s I-Score Plus defense, the Parties completed six (6) depositions, sent multiple sets of discovery, and produced thousands of pages of documents. The Parties completed discovery on March 29, 2023. The existing Summary Judgment Deadline is April 12, 2023.

GOOD CAUSE TO EXTEND DEADLINE

The Parties were diligent in conducting the Initial Phase of Discovery in this matter and, as set forth above, vigorously sought and obtained discovery relating to the I-Score Plus defense. Good cause for the extension is based on the need for additional time to thoroughly assess the discovery conducted and prepare a motion for summary judgment in light of the complexity of the issues involved. Moreover, the Parties are requesting the extension due to the upcoming holidays and counsels’ traveling schedules. The Parties thus make the present request to extend the Summary Judgment Deadline in view of the issues identified above.

The Parties have stipulated and agreed to extend the Summary Judgment Deadline by an additional seven (7) days as set forth below. This extension will ensure that the relevant

information and issues are reviewed and properly briefed for the Court to rule on any summary judgment motions. For these reasons, this Stipulation is made for good cause and not for purposes of delay.

The Parties hereby stipulate and agree to only extend the existing Summary Judgment Deadline of April 12, 2023, seven (7) days to April 19, 2023. All other deadlines remain the same.

IT IS SO AGREED AND STIPULATED:

DATED this 10th day of April, 2023.

LEWIS ROCA ROTHGERBER
CHRISTIE LLP

By: /s/ G. Warren Bleeker
G. WARREN BLEEKER
(Admitted Pro Hac Vice)
655 N. Central Ave., Suite 2300
Glendale, CA 91203-1445
Tel: (626) 795-9900
Email: wbleeker@lewisroca.com

MICHAEL J. MCCUE
MENG ZHONG
3993 Howard Hughes Pkwy., Suite 600
Las Vegas, NV 89169
Tel: (702) 949-8200
Email: mmccue@lewisroca.com
Email: mzhong@lewisroca.com

*Attorneys for Plaintiff/Counter-Defendant
Empire Technological Group Limited*

DATED this 10th day of April, 2023.

DICKINSON WRIGHT PLLC

By: /s/ John L. Krieger
MICHAEL N. FEDER
Nevada Bar No. 7332
JOHN L. KRIEGER
Nevada Bar No. 6023
3883 Howard Hughes Parkway, Suite 800
Las Vegas, NV 89169
Tel: (702) 550-4400
Email: mfeder@dickinson-wright.com
Email: jkrieger@dickinson-wright.com

JOHN S. ARTZ
(Admitted Pro hac vice)
YAFEEZ S. FATABHOY
(Admitted Pro hac vice)
350 S. Main Street, Suite 300
Ann Arbor MI, 48104
Tel: (248) 433-7200
Email: jsartz@dickinson-wright.com
Email: yfatabhoy@dickinson-wright.com

*Attorneys for Defendants/Counter-Plaintiffs
Light & Wonder, Inc. and SG Gaming, Inc.*

IT IS SO ORDERED:



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

DATED: April 12, 2023